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Attorneys for True Names, Ltd. and Virgil Griffith

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

True Names, Ltd. d/b/a Ethereum Name
Service, a Singapore corporation, and Virgil
Griffith, an individual

Plaintiff,

v.

GoDaddy, Inc., a Delaware corporation,
and GoDaddy.com LLC, a Delaware
corporation, Dynadot LLC, a California
corporation, and Manifold Finance, Inc., a
Delaware corporation.

Defendants.

Case No. 2:22-cv-01494-JJT

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANTS
GODADDY, INC., GODADDY.COM
LLC, AND DYNADOT LLC TO
ANSWER OR RESPOND TO THE
AMENDED COMPLAINT (Second
Request)**

This action was filed by Plaintiffs True Names, Ltd., and Virgil Griffith (“Plaintiffs”) on September 5, 2022. (*See* Dkt. No. 1 (“Complaint”).)

Plaintiffs served the summons and Complaint on Defendants GoDaddy, Inc., GoDaddy.com LLC and Manifold Finance, Inc. on September 6, 2022, and on Dynadot LLC on September 7. (*See* Dkt. Nos. 12, 13, 14, and 15).

Plaintiffs then filed an amended complaint on September 21, 2022. (*See* Dkt. No. 24 (“Amended Complaint”).) Plaintiffs served the summons and Amended Complaint on Defendants GoDaddy, Inc. and GoDaddy.com LLC on September 26, 2022, on Dynadot,

1 LLC on September 29, 2022, and on Manifold on September 23, 2022. (*See* Dkt. Nos.
2 30, 31, 32, and 33).

3 GoDaddy, Inc., GoDaddy.com LLC, and Dynadot, LLC (“the Stipulating
4 Defendants”) and Plaintiffs stipulated to an extension to the deadline for them to answer
5 or respond to the Amended Complaint to October 31, 2022. (Dkt. No. 34). The Court
6 granted this extension. (Dkt. No. 38) The Stipulating Defendants and Plaintiffs have since
7 agreed to an additional extension of time to answer or respond to the Amended Complaint
8 until **November 11, 2022**.

9 Good cause exists for this in order to afford the Stipulating Defendants time to
10 assess the allegations and to afford the parties additional time to discuss a potential
11 resolution of the instant dispute. No other deadlines will be affected by this stipulated
12 extension. This is GoDaddy, Inc., GoDaddy.com LLC, and Dynadot LLC’s second
13 request for an extension concerning this matter.

14 Accordingly, for the reasons presented herein, the parties respectfully request that
15 the Court enter an order extending the deadline for Defendants GoDaddy, Inc.,
16 GoDaddy.com LLC, and Dynadot, LLC to answer or respond to the Amended Complaint
17 to **November 11, 2022**. A proposed order consistent with the relief requested herein is
18 submitted concurrently herewith.

19 Executed in San Francisco, California, on this 27th day of October 2022.

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21 /s/ Jacob Canter
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